

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**United States of America**

**v.**

**Edward Martin Jaquez Duarte**

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**No. 1:22-cr-60-PB-01**

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**Indictment**

The Grand Jury charges:

**COUNT ONE**

[False Statement in Application for a Passport – 18 U.S.C. § 1542]

On or about June 13, 2012, in the District of New Hampshire, the defendant,

**Edward Martin Jaquez Duarte,**

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application **Jaquez Duarte** stated a name, date of birth, place of birth, and social security number that were not his own, when he knew those statements were false.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO

[Aggravated Identity Theft – 18 U.S.C. § 1028A(a)(1)]

On or about June 13, 2012, in the District of New Hampshire, the defendant,

**Edward Martin Jaquez Duarte,**

did knowingly use, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of another person, V.M.D.M., during and in relation to a felony violation of Title 18, United States Code, Section 1542, as alleged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

[18 U.S.C. § 1015(e) – False Representation of Citizenship]

On or about July 20, 2017, in the District of New Hampshire, the defendant,

**Edward Martin Jaquez Duarte,**

did knowingly make a false statement and claim that he was a citizen of the United States with the intent to obtain on his own behalf a State of New Hampshire benefit, namely, to induce the New Hampshire Department of Safety, Division of Motor Vehicles to issue him a New Hampshire driver's license. When applying for a New Hampshire driver's license, **Jaquez Duarte** checked a box on the application answering "Yes" to the question "Are you a United States Citizen?," when in truth and in fact, **Jaquez Duarte** knew that he was a citizen of the Dominican Republic, and not a citizen of the United States.

In violation of Title 18, United States Code, Section 1015(e).

COUNT FOUR  
[Aggravated Identity Theft – 18 U.S.C. § 1028A(a)(1)]

On or about July 20, 2017, in the District of New Hampshire, the defendant,

**Edward Martin Jaquez Duarte,**

did knowingly use, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of another person, V.M.D.M., during and in relation to a felony violation of Title 18, United States Code, Section 1015(e), as alleged in Count Three of this Indictment.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

/s/Grand Jury Foreperson  
Grand Jury Foreperson

JANE E. YOUNG  
United States Attorney

/s/ Anna Dronzek  
Anna Dronzek  
Assistant United States Attorney

Date: May 31, 2022